

Hearing Date: May 9, 2006 at 10:00 a.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

(Jointly Administered)

**LIMITED OBJECTION OF AD HOC TRADE COMMITTEE TO MOTION OF
INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE AND
IMPLEMENT WORKERS OF AMERICA (UAW) TO LIMIT PARTICIPATION
IN THE HEARING ON DELPHI'S SECTION 1113 AND SECTION 1114 MOTION**

The Ad Hoc Committee of Trade Claimants (the "Ad Hoc Trade Committee") of Delphi Corporation ("Delphi") and its affiliated debtors (collectively, with Delphi, the "Debtors"), by and through its attorneys, Orrick, Herrington & Sutcliffe LLP ("Orrick"), hereby files this limited objection (the "Objection") to the Motion of International Union, United Automobile, Aerospace and Implement Workers of America ("UAW") To Limit Participation In The Hearing On Delphi's Section 1113 and Section 1114 Motion (the "UAW Motion"), and in support thereof respectfully states as follows:

1. The Ad Hoc Trade Committee consists of a number of holders of trade claims, and was recently formed for the purpose of protecting the rights of trade claimants throughout these cases.

2. The Ad Hoc Trade Committee has filed a response (the “Response”) to the Limited Objection of Wilmington Trust Company (the “WTC Objection”) and the Supplemental Objection of Appaloosa Management L.P. and Wexford Capital LLC (the “Appaloosa Objection”) to the Debtors’ Motion For Order, Under 11 U.S.C. § 1113(c) Authorizing Rejection of Collective Bargaining Agreements and Under 11 U.S.C. § 1114(g) Authorizing Modification of Retiree Welfare Benefits (the “Rejection Motion”). In the Response, the Ad Hoc Trade Committee supports and adopts the Debtors’ position that a motion under Sections 1113 and 1114 of the Bankruptcy Code does not necessitate a specific determination of claim amounts which would result upon rejection of the collective bargaining agreements and modification of the retiree welfare benefits.

3. However, if the Court expands the Rejection Motion and considers arguments on the impact that a grant of the Rejection Motion would have on each of the Debtors and the recoveries to their respective creditors, the Ad Hoc Trade Committee objects to the UAW Motion to limit participation at the hearing and hereby requests leave of the Court to be heard on such motion.

CONCLUSION

For the reasons set forth herein, the Ad Hoc Trade Committee respectfully requests that should the Court expand the Rejection Motion and consider arguments on the impact that a grant of the Rejection Motion would have on each of the Debtors and the recoveries to their respective

creditors, the UAW Motion be denied, and that the Court grant such other relief as may be just and proper.

Dated: New York, New York
May 5, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: _____/s/
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